

Exhibit 65

Ian G. DiBernardo
Timothy K. Gilman
Kenneth L. Stein
Saunak K. Desai
Gregory R. Springsted
STROOCK & STROOCK & LAVAN LLP
180 Maiden Lane
New York, NY 10038
Tel: (212) 806-5400
Fax: (212) 806-6006
Email: idibernardo@stroock.com
Email: tgilman@stroock.com
Email: kstein@stroock.com
Email: sdesai@stroock.com
Email: gspringsted@stroock.com

Attorneys for Plaintiff Kewazinga Corp.

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

KEWAZINGA CORP.,)	
)	
Plaintiff,)	Civil Action No. 1:20-cv-01106-LGS
)	
vs.)	
)	
GOOGLE LLC,)	
)	
Defendant.)	
)	

PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, Kewazinga Corp. ("Kewazinga") hereby provides the following supplemental initial disclosures:

GENERAL OBJECTIONS

1. The following disclosures are based upon information reasonably available to, and currently in the possession, custody or control of Kewazinga. To the best of Kewazinga's knowledge, information and belief, these disclosures are complete and correct as of the date they

The above-referenced categories of documents are being compiled and will be maintained at the offices of Stroock & Stroock & Lavan LLP, 180 Maiden Lane, New York, NY 10038. Kewazinga reserves the right to amend or supplement this list of categories of documents as necessary.

DAMAGES

Pursuant to Rule 26(a)(1)(A)(iii), Kewazinga is in the process of quantifying its damages through discovery, but cannot estimate the amount of its damages at this time, particularly as discovery is ongoing. Present categories of damages sought include: a reasonable royalty for past infringement, pre- and post-judgment interest, attorney fees and costs, and enhanced damages.

Kewazinga's review of damages is ongoing and the amount of such damages will be the subject of expert inquiry and testimony, to be disclosed in accordance with the Federal Rules of Civil Procedure and in accordance with this Court's Case Management Order. Kewazinga will amend and/or supplement this response as discovery progresses.

INSURANCE

Kewazinga is currently unaware of any insurance or indemnity agreement applicable to this disclosure.

Dated: New York, New York
April 30, 2020

Respectfully submitted,

STROOCK & STROOCK & LAVAN LLP

/s/ Ian G. DiBernardo

Ian G. DiBernardo

Timothy K. Gilman

Kenneth L. Stein

Saunak K. Desai

Gregory R. Springsted

STROOCK & STROOCK & LAVAN LLP

180 Maiden Lane

New York, NY 10038

Tel: (212) 806-5400

Fax: (212) 806-6006

Email: idiBernardo@stroock.com

Email: tgilman@stroock.com

Email: kstein@stroock.com

Email: sdesai@stroock.com

Email: gspringsted@stroock.com

Counsel for Plaintiff Kewazinga Corp.

CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2020, I caused a true and correct copy of **PLAINTIFF'S RULE 26(a)(1) INITIAL DISCLOSURES** to be served in accordance with the Federal Rules of Civil Procedure, and/or the Local Rules of this Court, upon the following parties and participants, *via* email:

John Michael Desmarais
Elizabeth Esther Weyl
Ameet A. Modi
Steven Marc Balcof
DESMARAIS LLP
230 Park Avenue
New York, NY 10169
Tel: (212)–351–3400
Fax: (212)–351–3401
Email: jdesmarais@desmaraisllp.com
Email: eweyl@dllp.com
Email: amodi@desmaraisllp.com
Email: sbalcof@dllp.com

Emily Chen (*Pro Hac Vice Pending*)
DESMARAIS LLP
101 California St.
San Francisco, CA 94111
Tel: (415) 573–1806
Email: echen@desmaraisllp.com

Counsel for Defendant Google LLC

s/ Gregory R. Springsted
Gregory R. Springsted